

EXHIBIT 2

From: [Cirino, Paul \(ENRD\)](#)
To: [Kristina Hambley](#)
Cc: [Brown, Lucy E. \(ENRD\)](#); [Barbata, Dana \(USAHI\)](#); [Daniel Cooper](#); [Philip Gregory](#); [William Harrison](#)
Subject: RE: [EXTERNAL] Request for meet and confer--1:22-cv-00272 LEK-RT
Date: Wednesday, March 26, 2025 5:25:00 PM
Attachments: [Exhibit Y - Redacted 3-26-2025.pdf](#)
[Exhibit Z - Redacted 3-26-2025.pdf](#)
[Exhibit C - Redacted 3-26-2025.pdf](#)

Kristina—

I have attached redacted versions of Exhibits C, Y, and Z. Defendants have no objection to the public filing of these redacted exhibits.

The Court's March 14, 2025, Order emphasized that the information to be filed under seal "must be relevant to the issues presented in the intended motion for summary judgment." Dkt. 170. Based on our meet and confer on February 4, 2025, our understanding has been that Plaintiffs' motion for partial summary judgment will address only the 2020 and 2021 releases at Hotel and Kilo piers. Portions of the proposed exhibits, however, are not limited to those two piers, but reference other parts of the fuel distribution facility at Joint Base Pearl Harbor-Hickam. Defendants reserve their right to object to the portions of those exhibits (and other exhibits) that do not relate to Hotel and Kilo piers.

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From: Kristina Hambley <kristina@sycamore.law>
Sent: Friday, March 21, 2025 2:28 PM
To: Cirino, Paul (ENRD) <Paul.Cirino@usdoj.gov>
Cc: Brown, Lucy E. (ENRD) <Lucy.E.Brown@usdoj.gov>; Barbata, Dana (USAHI) <Dana.Barbata@usdoj.gov>; Daniel Cooper <daniel@sycamore.law>; Philip Gregory <pgregory@gregorylawgroup.com>; William Harrison <william@harrisonlawcenter.com>
Subject: Re: [EXTERNAL] Request for meet and confer--1:22-cv-00272 LEK-RT

Good afternoon,

I am following up on our meet and confer request of March 18 regarding Plaintiffs' amended motion to seal. We hope scheduling time for next week provides Defendants with sufficient time to review Plaintiffs' proposal and the relevant exhibits. We remain available to meet next week on **Monday 3/24 from 8am to 3pm PT** and **Wednesday 3/26 from 8am to 3pm PT**. Please let me know if there is a time within those windows